

## **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GP I, LLC, Visionary  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF THOMAS ALBERT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Thomas Albert, declare as follow:

1. My name is Thomas Albert.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in December 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$10,000.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. This experience closely mirrors that outlined in the Oliver and Company, et al vs. Zamber, Cosby, Grenley, VPEG lawsuit referenced here. Specifically my experience regarding the lack of distributions described in paragraphs 36-38 of this lawsuit is identical. In addition, I

also observed the acceptance of funds in violation of sect. 2.2 of the Limited Partnership Agreement, as described in the lawsuit paragraph 42.

6. Audited financial statements have never been made available, as described in the lawsuit paragraph 44, also in breach of the Limited Partnership Agreement.

7. Mirroring the lawsuit paragraphs 54 and 57, the defendants either failed to respond to my redemption request, then provided false promises relating to VPEG's efforts to acquire new investors to "buy my shares".

8. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 31, 2025

/s/ Thomas Albert

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, and Visionary Fund Manager, LLC

Defendants,

and

Visionary Private Equity Group I, LP

Nominal Defendant.

CIVIL ACTION NO. 4:25-cv-00132

**DECLARATION OF KEVIN DELEON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Kevin DeLeon, declare as follow:

1. My name is Kevin DeLeon.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I was an independent contractor with Visionary Private Equity Group.
4. I was hired by Dr. Zamber in the summer of 2015 as an independent contractor for Visionary Private Equity Group and I submitted my resignation on March 24, 2025.

5. I am presently owed at least \$75,000 for services rendered by and through my limited liability company, Highgate Capital, LLC, that I am pursuing through my own arbitration.

6. I never received or signed a copy of the Visionary PE GP I, LLC operating agreement to acquire membership interest in Visionary PE GP I, LLC.

7. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.

8. I was initially hired as an advisor to a VPEG portfolio company, Victory Energy (now Victory Clean Energy, via merger) and was subsequently recruited by Dr. Zamber to help identify investment opportunities, given my corporate finance and private equity background (which now exceeds thirty years, after earning a degree in economics from Yale University).

9. During my tenure at VPEG, I brought in some of the fund's most successful investments, including, but not limited to, Tusk Ventures, Lemonade, FanDuel, SneakerCon (via Jeff Fried) and Forever Oceans. Tusk Ventures was a first-time fund formed by a well-known regulatory catalyst named Bradley Tusk, who was largely responsible for unlocking value at Uber.

10. Through my relationship with a fund marketing agent who I had known for many years, VPEG was invited to participate in the Tusk fund and committed \$1 million.

11. With my direction and encouragement, VPEG subsequently co-invested in Lemonade (\$200k) and FanDuel (\$500k). The "life to date" distributions for those investments total just over \$8.5 million, with 25% of the FanDuel investment still being unrealized and the fund investment still performing.

12. Periodically, Tusk through its administrators, Leverpoint, conducted pro rata cash calls to fund its investments, and on several occasions, VPEG was unable to meet those cash calls.

13. On June 7, 2019, VPEG was sent a default notice, which, in my opinion, would have been catastrophic for the fund and its LPs. In fact, both Dr. Zamber and Mr. Cosby had been given ample notice and, through my efforts, opportunity to redress the delinquency, without escalating to default, which was purportedly irrevocable.

14. Among other penalties, the default allowed Tusk to return 50% of VPEG's invested capital and deny VPEG any future participation in fund distributions. Through my efforts and relationships, I was able to convince Bradley to give VPEG another chance, but significant reputational damage was done. And, despite assurances by Dr. Zamber that it would never happen again, he was delinquent on yet another capital call, in August 2024.

15. Please note that this merely serves as one of many examples of actions and behaviors that were, in my opinion, negligent and irresponsible.

16. In fact, during these capital call incidents, Dr. Zamber had been regularly adding to VPEG overhead, throughout, including advisors, office space and, troublingly, his media operations, in Nashville. All, while not only missing these critical capital calls, but falling deeply in arrears with commitments to pay his people, including me, resulting in various levels of hardship, of which Dr. Zamber and Mr. Cosby were acutely aware.

17. Sometime during this period, the term "empire-building" entered the vernacular, as Dr. Zamber added offices in Santa Monica, Malibu, Nashville and the St. Louis area (some short-dated leases or sublets), while expressing interest in an office in New York City. I raised concerns about this excessive spending but they were summarily ignored.

18. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

19. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 22, 2025

s/ Kevin DeLeon

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GP I, LLC, Visionary  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO. 4:25-cv-00132

**DECLARATION OF SCOTT FARON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Scott Faron, declare as follow:

1. My name is Scott Faron.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group on 1/10/2017, and the total of my investments with Visionary Private Equity Group and its affiliates is \$10,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.
6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.



7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 14, 2025

/s/ Scott Faron

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GPI, LLC, Visional)!  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO. 4:25-cv-00132

**DECLARATION OF SUZANNE FARON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Suzanne Faron, declare as follow:

1. My name is Suzanne Faron.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2017, and the total of my investments with Visionary Private Equity Group and its affiliates is \$10,000.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.

6. We were promised interest of 8% to be paid to the account each year. This has only happened once in 7 years.

7. We were supposed to be paid a distribution each time a company sold and this has never happened. In general we agree with the Oliver and Company Law suit.

8. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 13, 2025

A handwritten signature in black ink, appearing to read 'Suzanne Faron', with a long horizontal line extending from the end of the signature.

Suzanne Faron

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GP I, LLC, Visionary  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO. 4:25-cv-00132

**DECLARATION OF JOEL M. HOUSEWRIGHT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Joel M. Housewright, declare as follow:

1. My name is Joel M. Housewright.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in October 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$50,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience.

I, Joel Housewright, have never spoken personally with Ronald Zamber or Michael Coby, but I have had numerous conversations with Robert Grenley (to be referred by the initials R.G.). He was assigned as my contact person approximately 2 years after we invested in Visionary Private

Equity Group, which was in October of 2016. Prior to Mr. Grenley, we received information through Brigitte Bonetti (to be referred by the initials B.B.), who was our original contact in signing up for said investment. Some, but not all, of the false information disseminated to us includes:

- a) 8% Accrued Earning paid yearly. The money allotted for the 8% accrued earning would come from oil wells owned through Victory Energy and mineral rights, that were owned by the VPEG. (B.B.)
- b) Victory Energy (VYFY) would sell, or uplist to a new index (i.e. NASDAQ) by the end of 2016, or at the latest early 2017. At such time, this would return to us our initial investment, at which time VPEG I would close and move to VPEG II. (B.B.)
- c) May 6, 2017, we were told at a group gathering, that the Victory Energy uplist was still in the hands of the Security Exchange Commission (SEC.) (R.G.)
- d) Annual audits would be performed and shared with investors.
- e) After the sale or uplist of the first portfolio company of the VPEG:
  - a. VPEG I would be closed. (B.B. and R.G.)
  - b. No more investors would be accepted at the Initial Investor's Phase price point, which was \$1/share. (B.B. and R.G.)
  - c. An audit would be performed at this time to establish the value of the investment and establish a new per share price point for VPEG II. (B.B. and R.G.)
- f) Proceeds from the sale of portfolio companies Lemonade (LMND) and FanDuel would be used to "make investors whole" as far as the owed 8% Accrued Earnings. This was in 2020. (R.G.)


g) VPEG I was a maximum 14-year investment, as per the Private Placement Memorandum.

My wife, Sue, and I brought the VPEG investment to multiple friend and family that resulted in approximately 1.5 million dollars invested. We did so upon good faith as to the alleged integrity of those involved, and the sales materials and promise brought forth by them. It has been a continuation of stalling tactics and lies throughout the 9 years of involvement in this investment. My wife demanded her investment be returned several years ago, as have many of our friends, due to all the lies and lack of fulfilled promises. None of these people received their accrued earning upon request that their investment be returned, despite their time in the investment and all the lies bestowed upon all of us.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 14, 2025

  
JOEL M. HOUSEWRIGHT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GP I, LLC, Visionary  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO. 4:25-cv-00132

**DECLARATION OF HARVEY C. JACKSON III IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Harvey C. Jackson III, declare as follow:

1. My name is Harvey C. Jackson III.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$10,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. Lack of transparency, details, and responsiveness on financials matters including status of the fund and distributions. Misrepresentations or omissions about my investment and retaining my investment including, any request to redeem.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 14, 2025

Harvey C. Jackson III.  
4-11-2025



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GP I, LLC, Visionary  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO.

**DECLARATION OF MARTY KNOBLOCH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Marty Knobloch, declare as follows:

1. My name is Marty Knobloch.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group on December 15, 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$20,000.00.
5. I am dissatisfied with the management of Visionary Private Equity Group based on my own experience:
  - a. In November 2016, Patrick Lepski, VPEG's Assistant Director of Investor Relations, pitched VPEG to me and a small group at the Ritz Carlton in Clayton, MO. During this presentation, Mr. Lepski stated that several "liquidation events"

were imminent. He also informed us that as these "liquidation events" occurred, investors would have a choice of receiving their initial investment back or staying in the fund with various options. I sense that the presentation and description of these "liquidation events" was a "fear of loss" effort to get investment commitments from the group. By May 2018, only one such event had occurred.

- b. In March 2018, I raised specific concerns with VPEG's Assistant Director of Investment Relations related to VPEG's valuation of its investment in BioHiTech Global, Inc., which, appeared illogical.
- c. At the same time, Mr. Lepski told me that VPEG's General Counsel, Michael Cosby, was in the middle of closing Fund I and opening Fund 2 from a legal entity standpoint.
- d. In May 2018, I brought my concerns directly to VPEG's General Counsel, Michael Cosby. In an email, I expressed my frustration with VPEG's lack of transparency related explicitly to forthcoming "liquidation events," the sale or listing of Victory Energy, and the closing of the "First Fund," which was supposed to happen in February 2017. I also sought quantifiable or monetized analysis of VPEG's long-term plan.
- e. My trust in VPEG deteriorated after two meetings with Michael Cosby in St. Louis when I discovered his real legal expertise involved aeronautical issues, and he was very forthcoming about the time and potential conflict he had as an employee of Husch Blackwell LLP.

6. Based on my own experience and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 23, 2025

s/ Marty Knobloch

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GP I, LLC, Visionary  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO. 4:25-cv-00132

**DECLARATION OF CATHY SULLIVAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Cathy Sullivan, declare as follow:

1. My name is Cathy Sullivan.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in October 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$ 15,000.00.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. I was promised many things that never happened and when I would call, I would never get a response.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 14, 2025

A handwritten signature in cursive script, reading "Cathy Sullivan", written over a horizontal line.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Oliver and Company, et al.,

Plaintiffs,

vs.

Dr. Ronald Zamber, Michael Cosby, Robert  
Grenley, Visionary PE GP I, LLC, Visionary  
Private Equity Group I, LP, and Visionary  
Fund Manager, LLC,

Defendants.

CIVIL ACTION NO. 4:25-cv-00132

**DECLARATION OF MIKE SULLIVAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF**

I, Mike Sullivan, declare as follow:

1. My name is Mike Sullivan.
2. I am over the age of 18 and have personal knowledge of the facts described herein. If called as a witness, I could and would testify competently and truthfully to these matters.
3. I am an investor with Visionary Private Equity Group.
4. I began investing with Visionary Private Equity Group in October 2016, and the total of my investments with Visionary Private Equity Group and its affiliates is \$10,000.
5. I am dissatisfied with the management of Visionary Private Equity Group, based on my own experience. Promise of yearly checks, and funds to be paid to me, after phone calls of promises all lies. Just want to keep charging for paperwork. Never received a single payment.

6. Based on my own experience, and the information contained in the Complaint filed by Plaintiffs in this matter, I support the removal of Dr. Ronald Zamber, Robert Grenley, and Michael Cosby, from their respective positions at Visionary Private Equity Group.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 14, 2025

A handwritten signature in black ink, appearing to read "Mike Seltzer", is written over a horizontal line.